

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

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SALLY W. TARQUINIO

Plaintiff,

v.

JOHNS HOPKINS UNIVERSITY  
APPLIED PHYSICS LAB

Defendant.

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Civil Action No. 1:23-CV-00727-RDB

**DEFENDANT JOHNS HOPKINS UNIVERSITY  
APPLIED PHYSICS LAB’S MOTION FOR SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and Local Civil Rule 105, Defendant Johns Hopkins University Applied Physics Lab (“APL”), through counsel, hereby moves for summary judgment on Plaintiff Sally Tarquinio’s Amended Complaint.

Plaintiff alleges APL discriminated against her because of her disability. APL did not do so. In response to the COVID-19 pandemic, APL implemented a lawful vaccine requirement for its employees. Employees could request a reasonable accommodation based on their disability or religion. Rather than provide APL the information necessary to evaluate her request for accommodation, Plaintiff chose not to engage in the interactive process with APL. Plaintiff refused repeatedly to provide current medical documentation or to authorize APL to communicate with her medical providers. Because Plaintiff refused to provide the necessary medical information, her request for accommodation was denied and her employment with APL ended because she failed to comply with APL’s lawful vaccine policy.

For all these reasons, and those explained in APL’s Memorandum of Support accompanying this Motion, APL asks the Court to grant summary judgment and dismiss Plaintiff’s

action with prejudice. A Proposed Order is attached.

Dated: January 11, 2024

Respectfully submitted,

**JACKSON LEWIS P.C.**

By: /s/ Jeremy S. Schneider

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*Counsel for Defendant Johns Hopkins University  
Applied Physics Laboratory*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 11th day of January, 2024, I caused a copy of the foregoing to be electronically filed with the Clerk of Court and sent to the following via U.S. first class mail, postage prepaid:

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*Counsel for Plaintiff*

/s/ Jeremy S. Schneider

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